IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

FORMER BL STORES, INC., et al., 1

Case No. 24-11967 (JKS)

Debtors.

(Jointly Administered)

Re: D.I. 1898, 1941, 2110, 2214, 3256

CERTIFICATION OF COUNSEL REGARDING PAYMENT OF ADMINISTRATIVE EXPENSES OF META PLATFORMS, INC. AND HORIZON MEDIA LLC

The undersigned counsel to the above-captioned debtors and debtors in possession (the "Debtors") hereby certify as follows:

- 1. On October 23, 2025, the Court entered the *Order Approving Joint Stipulation Allowing Applications for Administrative Expenses of Meta Platforms, Inc. and Horizon Media, LLC* [Docket No. 3256] (the "Original Stipulation Order"). The Original Stipulation Order, together with all exhibits thereto, is incorporated by reference and made a part hereof as if fully set forth herein. Capitalized terms used but not otherwise defined shall have the meanings given to them in the Original Stipulation Order.
 - 2. After entry of the Original Stipulation Order, the Debtors erroneously paid to

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Horizon an amount equal to \$81,311.96 (the "Meta Payment"). The Meta Payment represents a pro rata distribution owed to Meta on account of the Allowed Meta Administrative Expense.

- 3. The Debtors and the Movants have engaged in good faith negotiations and have agreed to enter into a stipulation (the "<u>Stipulation</u>") to facilitate payment of the Meta Payment to Meta.
- 4. A copy of the Stipulation is attached as <u>Exhibit A</u> to the proposed form of order (the "<u>Proposed Order</u>"), attached hereto as <u>Exhibit 1</u>.
- 5. Counsel to each of the Movants has reviewed the Proposed Order and has agreed to its entry.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Court enter the proposed order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

Dated: November 6, 2025

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/s/ Sophie Rogers Churchill

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